

Exhibit A

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4
5 UNITED STATES DISTRICT COURT
6 FOR THE EASTERN DISTRICT OF WASHINGTON

7
8 NICOLAS ROLOVICH,
9 Plaintiff,

10 v.

11 WASHINGTON STATE
12 UNIVERSITY,

13 Defendant.
14

CASE NO: 2:22-CV-00319-TOR

**DECLARATION OF NICHOLAS
ROLOVICH**

15 1. My name is Nicholas Rolovich. I am over the age of eighteen,
16 competent to testify, and make this declaration based on my personal knowledge.
17

18 2. I first met Fr. Paul Heric in July 2021.

19 3. Fr. Paul is a Catholic priest and was at the time the Chaplain of the
20 St. Thomas More Catholic Cougs Student Center at WSU.
21

22 4. I was introduced to Fr. Paul through one of my football players,
23 Liam Ryan, who encouraged me to talk to Fr. Paul and gave me his cell phone
24 number.
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1 5. After I first reached out to Fr. Paul, our relationship developed
2 through text messages, phone calls, and time spent together in person.
3

4 6. Our conversations covered a wide range of topics including my
5 Catholic faith; how to understand my obligations as father, husband, and coach;
6 how to be a spiritual leader for others; and how to help our athletes deal with
7 adversity and loss.
8

9 7. Father Paul quickly became a friend and someone I looked to for
10 advice and encouragement.
11

12 8. I credit Father Paul with helping me reconnect with the Catholic
13 faith of my youth and grow closer to God.
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15 9. As part of our conversations, I asked for Fr. Paul's spiritual direction
16 and advice as I struggled with what to do in response to the pressure I was under
17 to get a COVID-19 vaccine.
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19 10. At first, Fr. Paul encouraged me to comply with WSU's wishes and
20 get vaccinated.
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22 11. However, as I continued to share my thoughts and concerns with
23 Father Paul, he told me I needed to understand my decision about the vaccine in
24 light of the Catholic Church's teaching on my religious obligation to form and
25 then follow my conscience.
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